

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JAMAL HAMMOUD,

Plaintiff,

-against-

SOCIÉTÉ GÉNÉRALE DE BANQUE AU LIBAN,

Defendant.

**1:20-cv-00106-MKV**

**DECLARATION OF MICHAEL J. SULLIVAN  
IN SUPPORT OF MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT**

I, Michael J. Sullivan, declare:

1. I am a Partner with Ashcroft Law Firm, counsel for Defendant Société Générale De Banque au Liban S.A.L. ("SGBL") in the above-captioned action. I am admitted *pro hac vice* to practice before this Court. I submit this declaration to place before this Court certain documents referenced in SGBL's Memorandum of Law in Support of its Motion to Dismiss Plaintiff's Amended Complaint.

2. Attached hereto as Exhibit A is a true and correct copy of the November 17, 2019, Press Release from the Association of Banks in Lebanon.

3. Attached hereto as Exhibit B is a true and correct copy of bank checks, dated February 4, 2020.

4. Attached hereto as Exhibit C is a true and correct copy of the Declaration of Jeanine Kabengi.

5. Attached hereto as Exhibit D is a true and accurate copy of the Account Opening Application, in both Arabic and English.

6. Attached hereto as Exhibit E is a true and correct copy of the January 17, 2020, article from Reuters entitled “Frustrated Lebanese depositors turn rage on crisis-hit banks,” by Eric Knecht.

7. Attached hereto as Exhibit F is a true and correct copy of the Declaration of Joseph Khoury-Hélou.

I declare, upon personal knowledge and under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and accurate.

Dated: June 18, 2021

*Counsel for Defendant Société  
Générale de Banque au Liban S.A.L.*

/s/ Michael J. Sullivan  
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